

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
MATTHEW WILSON

1 I, Matthew Wilson, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the Executive Director of Oasis Youth Center, the only LGBTQ youth center
5 in Pierce County. I've worked at Oasis for fifteen years and have been in my current role for five
6 years. I have a bachelor's degree in political science. I grew up in Pierce County. When I was a
7 teenager, I was involved with Oasis as a community member.

8 3. In my current role, I oversee administrative work, supervise employees, provide
9 direct support to youth in difficult advocacy situations, fundraise, and engage generally with our
10 community.

11 4. Oasis' mission is to transform the lives of queer and questioning youth by creating
12 a safe place to learn, connect, and thrive. Oasis envisions a world in which queer youth are valued
13 in the community as strong, creative leaders. We use a youth adult partnership model, where
14 youth and adults come together for shared learning, teaching, and action. We have a youth
15 council, and youth come up with our programming, as well as serve on our board of directors.
16 We serve youth ages 11 to 24, and while we primarily serve individuals in Pierce County, we
17 also offer some remote programming that is accessible to anyone across the state.

18 5. For me personally, Oasis is a program that changed and saved my life. It helped
19 me not feel alone. I went to school in eastern Pierce County and there were only two out gay
20 people at school. Oasis helped me make friends. It helped me feel more confident. It also
21 provided me with an opportunity to grow my leadership skills. I would not be the person I am
22 today if it were not for Oasis.

23 6. Oasis is a place to be who you are. It is a community center first. In addition, our
24 programming spans three aspects. First, we provide advocacy on behalf of the youth. We talk to
25 schools if youth are getting bullied at school, we provide emergency financial assistance, and
26 whatever else they need. Second, we develop youth leaders. We help build youths' public

1 speaking skills, their ability to fundraise, and to overall be a leader within their community.
2 Third, we engage in prevention efforts. This includes HIV prevention and sexual assault
3 prevention. We teach youth about what healthy relationships and friendships look like.

4 7. We also help youth access gender-affirming care. We host a health and gender
5 bazaar, where youth can connect with providers who provide gender-affirming care. Youth can
6 also get clothing and items like binders. We also generally help youth access mental health
7 counseling, and we can provide financial support for family therapy.

8 8. We serve approximately 600 youths a year. Sixty-nine percent of those youth
9 identify as gender diverse. We estimate that approximately eighty percent of the youth we serve
10 are from low to moderate income households. Approximately sixty percent experience food
11 insecurity. Forty-three percent are youth of color.

12 9. I understand that the President of the United States has issued an executive order
13 preventing trans youth from accessing gender-affirming care. We believe this is discriminatory.
14 Hormone replacement therapy and surgery are available to many people, including those who
15 do not identify as trans. But this order only limits trans people from accessing that medical care.
16 The order also uses the offensive term mutilation, but for most youth it's the opposite—
17 gender-affirming care prevents irreversible changes to their bodies that would later require
18 surgery to correct.

19 10. The executive order will cause difficulties with our programming. We are
20 concerned that the portion of our budget that comes from federal funding will be stopped. We
21 worry that youth will lose access to health insurance, and there may be fewer health care
22 providers to which we can refer them. We've also seen a dramatic increase in attendance at Oasis
23 since the recent presidential election. We've seen the number of individuals who attend our night
24 programming double. We have had to put more resources into providing food and staff for these
25 events. Our crisis intervention support hotline has also been inundated with more callers.
26

11. The youth we serve are scared. They fear losing access to hormone replacement therapy and puberty blockers. Youth are trying to crisis plan access to the medication they need, including considering more dangerous methods of seeking this care. Some youth have been seeking year-long prescriptions, but a lot of providers are not comfortable writing this long of a prescription for testosterone, which is a controlled substance. We have a weekly check-in program where youth share the highs and lows of their week. The low this week was overwhelmingly this executive order. Youth we serve also report increased bullying at schools, including being told that the President is “going to come for them.” Youth are worried that Oasis will not continue to exist.

12. If youth cannot access gender-affirming care, the result will be catastrophic. It will decrease their wellbeing, worsen their mental health, make youth feel like they can’t contribute to the world, and cause them to struggle in school. It will increase their feelings of isolation. Being trans can already affect your ability to participate in everyday life because you feel like you don’t fit in or that others will perceive you incorrectly. Since the election, we’ve seen a spike in calls to our crisis line from youth who are suicidal or on the verge of self-harm, and the youth that come to our in-person services describe being bullied more as well as being anxious and scared about their ability to continue to exist as themselves. We believe that this will only continue to worsen with this recent executive order and if gender-affirming care is made more difficult to access in Pierce County.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this ____ day of February 2025 at _____, Washington.

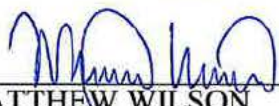
MATTHEW WILSON
Executive Director, Oasis Youth Center

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DATED this 4th day of February 2025 at Tacoma, Washington.


 MATTHEW WILSON
 Executive Director, Oasis Youth Center